

EX PARTE OR LATE FILED

GHZ Equipment Company, Inc. *The Fiberless Optics™ Company*

July 6, 1995

92-297

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FCC MAIL ROOM

Mr. William Caton, Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary Caton:

The attached letters are being submitted to the Commission as Ex Parte documents, the content of which was previously submitted to the Commission. This submittal is intended specifically to meet the technical requirements of the regulations.

Sincerely,



Steven P. Seiter
President

SPS/dwa
Enclosure

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EX PARTE OR LATE FILED

GHz Equipment Company, Inc.
4703 S. Lakeshore Dr.
Tempe, AZ 85282

June 6, 1995

Mr. Robert James
E-Mail: rjames@fcc.gov

RE: Local Multipoint Distribution Service
CC Docket No. 92-297, Ex Parte Presentation

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Dear Mr. James

As you know, GHz Equipment Co., Inc. ("GEC") has been an active participant in the search for adequate and appropriate spectrum for licensing the Local Multipoint Distribution Service ("LMDS"). In addition to our role in last year's negotiated rulemaking proceeding, we have been heavily involved in the development of state of the art millimeter wave technology. It is thus from a perspective of considerable experience that we wish to comment briefly upon several recent industry proposals for segmentation of the 28 GHz band.

Our principal concern is that the quantity of primary-use spectrum allocated for LMDS should not fall below 1,500 MHz. We continue to believe that a minimum of 750 MHz per licensee (assuming two licensees per service area) is essential to fulfill the promise of the varied millimeter wave applications we see flowing from new LMDS services, including competition to traditional cable with fiber (whose channel capacity is comparable to that of a 750 MHz LMDS system). Although compression technology, whenever it arrives, will increase channel capacity, the same technology will be available to the cable industry -- thus mooted the argument that compression will compensate for an initial shortfall in spectrum allocated for LMDS.

Indeed, in the event the Commission were persuaded that the allocation of less than 1,500 MHz of spectrum for LMDS was inevitable, given the conflicting forces at play in the LMDS proceeding, we would urge as an alternative that 2,000 MHz in the 40 GHz range be designated for LMDS use. It is well established in the research we have reviewed and in our own experience that the two bands are sufficiently comparable both in propagation characteristics and system cost for an LMDS-type service at 40 GHz to be a viable alternative.

Very truly yours,

Steven P. Seiter
President

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EX PARTE OR LATE FILED

GHz Equipment Company, Inc.
4703 S. Lakeshore Dr.
Tempe, AZ 85282

June 6, 1995

Mr. Thomas Tycz
E-Mail: ttycz@fcc.gov

RE: Local Multipoint Distribution Service
CC Docket No. 92-297, Ex Parte Presentation

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FCC MAIL ROOM

Dear Ms. Magnotti:

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Very truly yours,

Steven P. Seiter
President

E-mail cc Susan Magnotti
Bob James

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EX PARTE OR LATE FILED

GHz Equipment Company, Inc.
4703 S. Lakeshore Dr.
Tempe, AZ 85282

June 6, 1995

Ms. Susan Magnotti
E-Mail: smagnott@fcc.gov

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CC Docket No. 92-297, Ex Parte Presentation

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Very truly yours,

Steven P. Seiter
President

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